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 of Sonoma, Sheriff-Coroner William  
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 Shanahan, Caroline Japp, Jo Weber,  
 and Robin Smith

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

SALLY STEINHART,

No. CV-10-00841 RS

Plaintiff,

v.

COUNTY OF SONOMA, SHERIFF-CORONER  
 BILL COGBILL and DEPUTY SHERIFFS M.  
 SHANAHAN and CAROLYN ZOE; HUMAN  
 SERVICES DEPARTMENT DIRECTOR JO  
 WEBER; FAMILY, YOUTH & CHILDREN'S  
 SERVICES DIVISION DIRECTOR CAROL  
 BAUER, AND CHILD WELFARE  
 SERVICES/PROTECTIVE SERVICES SOCIAL  
 WORKER ROBIN SMITH, individually and in their  
 official capacities, CALIFORNIA DEPARTMENT  
 OF SOCIAL SERVICES, DOES 1-50, et al.,

**SECOND STIPULATION TO (1)  
 PERMIT FILING OF AN AMENDED  
 COMPLAINT, AND (2) EXTEND  
 COUNTY DEFENDANTS' TIME TO  
 RESPOND TO THE COMPLAINT;  
~~[PROPOSED]~~ ORDER**

Defendants.

This joint second stipulation and request for entry of order is entered into by and between  
 Plaintiff in pro per, Sally Steinhart ("Plaintiff"), and Defendants the County of Sonoma, Sheriff-  
 Coroner William Cogbill, Sheriff's Deputy Michael Shanahan, Sheriff's Deputy Caroline Japp  
 (erroneously sued herein as Carolyn Zoe), and Sonoma County employees Jo Weber and Robin

1 Smith (collectively, "County Defendants"). Defendant the State Department of Social Services is  
2 not a party to this stipulation. This stipulation and concomitant request for order is made based  
3 upon Plaintiff's request for additional time in which to prepare, file and serve an amended  
4 complaint, and a concomitant extension of time for County Defendants to file a responsive pleading.  
5 The terms and provisions of this stipulation and request for order are set forth below.

#### 6 **RECITALS**

7 A. Plaintiff filed her Complaint for Declaratory and Injunctive Relief and Damages  
8 herein on February 26, 2010 (the "Complaint"). Plaintiff believes that she effectuated service of the  
9 Complaint on all County Defendants identified above on or about May 12, 2010. Plaintiff has not  
10 yet effectuated service on Defendant the State Department of Social Services, nor Defendant and  
11 former Sonoma County employee Carol Bauer (retired).

12 B. Pursuant to a previous stipulation of Plaintiff and County Defendants, the Court  
13 entered an order, *inter alia*, permitting Plaintiff to file and serve an amended complaint through June  
14 15, 2010, and providing County Defendants with additional time in which to respond to the  
15 Complaint or amended complaint through July 15, 2010 (Docket No. 4).

16 C. Plaintiff has not yet been able to complete the preparation of her first amended  
17 complaint. Accordingly, Plaintiff requests additional time in which to file and serve her amended  
18 complaint, through June 18, 2010, and has agreed to permit County Defendants additional time in  
19 which to serve their responsive pleading, through July 19, 2010.

20 WHEREFORE, the parties hereby stipulate and request entry of a court order as follows:

#### 21 **STIPULATION**

22 1. Should Plaintiff desire to amend her complaint, she must file and serve an amended  
23 complaint in this action on or before June 18, 2010.

24 2. County Defendants shall file and serve their responsive pleading to either the initial  
25 Complaint or any amended complaint, as applicable, on or before July 19, 2010.

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3. This stipulation does not prevent or preclude the parties from seeking additional relief from this Court, to amend this stipulation and order or otherwise.

Respectfully submitted,

Dated: June 16, 2010

Stephen M. Woodside, County Counsel

By: /s/ Anne L. Keck  
Anne L. Keck, Deputy County Counsel  
Attorneys for County Defendants

Dated: June 16, 2010

Sally Steinhart, Plaintiff in pro per

By: /s/ Sally Steinhart  
Sally Steinhart

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**~~PROPOSED~~ ORDER**

Pursuant to the foregoing stipulation, and with good cause appearing,

IT IS HEREBY ORDERED that Plaintiff shall have through June 18, 2010, to file an amended complaint, and County Defendants shall have through July 19, 2010, to file a responsive pleading to either the initial or amended complaint, as applicable.

Date: 6/16/10

  
HONORABLE RICHARD SLEBORG  
United States District Judge